

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In Re:	§	
	§	
DEEP MARINE HOLDINGS, INC.,	§	Case No. 09-39313
et al.	§	
	§	Jointly Administered
Debtors.	§	Chapter 11

**DEBTORS' MOTION FOR EXPEDITED HEARING ON EXPEDITED MOTION TO
REJECT THE UNEXPIRED EXECUTORY LEASE OF
CAPROCK COMMUNICATIONS, INC.
(Relates to doc. no. 413)**

A HEARING WILL BE CONDUCTED ON THIS MATTER ON MAY 6, 2010 AT 3:00 P.M. IN COURTROOM 404, 515 RUSK, HOUSTON, TEXAS 77002. IF YOU OBJECT TO THE RELIEF REQUESTED, YOU MUST RESPOND IN WRITING, SPECIFICALLY ANSWERING EACH PARAGRAPH OF THIS PLEADING. UNLESS OTHERWISE DIRECTED BY THE COURT, YOU MUST FILE YOUR RESPONSE WITH THE CLERK OF THE BANKRUPTCY COURT WITHIN TWENTY-THREE DAYS FROM THE DATE YOU WERE SERVED WITH THIS PLEADING. IN ADDITION TO FILING YOUR RESPONSE WITH THE CLERK, YOU MUST GIVE A COPY OF YOUR RESPONSE TO THE PERSON WHO SENT YOU THE NOTICE; OTHERWISE, THE COURT MAY TREAT THE PLEADING AS UNOPPOSED AND GRANT THE RELIEF REQUESTED.

TO THE HONORABLE MARVIN ISGUR, UNITED STATES BANKRUPTCY JUDGE:

The above-captioned debtors and debtors-in-possession (together, the "Debtors"), by and through their undersigned attorneys, hereby file this Motion for an Expedited Hearing on the Debtors' Expedited Motion to Reject the Unexpired Executory Lease of CapRock Communications, Inc., and in support thereof respectfully represent as follows:

I.
JURISDICTION

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. Venue of these cases in this district is proper pursuant to 28 U.S.C. §§ 1408. This is a core proceeding pursuant to 28 U.S.C. § 157(b).

II.
RELIEF REQUESTED

2. The Debtors request that the Court set the Debtors' Expedited Motion to Reject the Unexpired Executory Lease of CapRock Communications, Inc. (the "Motion") for an expedited hearing on May 6, 2010, at 3:00 p.m. (a preset omnibus hearing date in this case).

III.
BASIS FOR RELIEF

3. The Motion requests that the Court enter an order allowing the Debtors to reject the Service Agreement with CapRock.

4. The Debtors request expedited consideration of the Motion because the Debtors no longer have a need for the Service Agreements or the property leased under the Service Agreements, as the Debtors' vessels are not currently in operation. The equipment leased by the Debtors under the Service Agreements could be put to a more economically beneficial use by CapRock. Additionally, under the terms of the Service Agreements there is the risk that the Debtors could be liable for damage to CapRock's property while it is in the Debtors' possession. In order to avoid claims by CapRock related to the property covered by the Service Agreements, the Debtors seek to reject the Service Agreements as soon as possible.

IV.
CONCLUSION

WHEREFORE, premises considered, the Debtors respectfully request that the Court grant the relief requested herein, set the Motion for expedited hearing on May 6, 2010, and grant the Debtors such other and further relief as the Court deems just.

Respectfully submitted,

BRACEWELL & GIULIANI LLP

By: /s/ Jason G. Cohen

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ATTORNEYS FOR THE DEBTORS

CERTIFICATE OF SERVICE

The undersigned certifies that on April 28, 2010, a true and correct copy of this document was served on all parties on the attached master service list by electronic means as listed on the court's ECF noticing system, by electronic mail as indicated, and/or by United States first class mail, postage prepaid.

/s/ Jason G. Cohen

Jason G. Cohen